

## REMARKS

Applicant is amending the claims to overcome minor errors and better define the invention. Applicant is amending the specification to match terminology with the amended claims. Applicant requests approval to amend Figure 1 of the drawings to add numerals as shown marked in red in the attachment. Since the drawings already showed the features, adding text to describe only what is shown in the drawing is not new matter. Applicant respectfully traverses the rejection of the claims and requests reconsideration.

Claim 1 as amended requires that the broom bar be located entirely forward of the wheels and transverse to the longitudinal axis of the frame with the bristles facing away from the frame while in the storage position. Folding the broom to this position enables the unit to be stored with the wheels on the ground and the frame tilted up against a vertical wall, as explained on page 8, lines 4-6.

Potter does not disclose a broom. If broom 86 of Gilberti were added to the land leveler of Potter, the combination claimed would still not be suggested. Gilberti's broom 86 stores in a position wherein only a part of the broom extends past wheels 14, not all of the broom. Also, broom 86 is stored parallel to the longitudinal axis of the frame, not transverse. Gilberti would not want broom 86 to store entirely forward of the wheels and transverse to the longitudinal axis because it would interfere with the driver's seat 62. Gilberti's broom is attached to a self-propelled vehicle, which would not be stored tilted against a rear wall, thus there would be no reason to store the broom as required by claim 1. No other reference cited by the Examiner shows a broom.

Claim 2 requires that the rake bar comprise a blade having a plurality of serrations, each of the serrations having inclined edges that converge toward each other to a peak. The drawings

show serrations 45 or 49 to be generally triangular. Applicants believe that serrations of this type facilitate grooming of baseball infield surfaces. Teeth 64 of Wilson are rectangular and do not have inclined side edges that converge toward each other to a peak. Scheunemann at Page 2, Column 2, lines 63-73, suggests serrated edges, but does not describe or show any serrations with inclined side edges converging to a peak. The serrated edges could be rectangular as shown by teeth 64 of Wilson. Combining Wilson and Scheunemann with Potter would not meet the requirement of claim 2.

Claim 3 requires that the rake bar be pivotally mounted to a rake bar arm to selected inclinations relative to the ground. Potters blade 22 is rigidly mounted to its arms 24 and cannot be pivoted relative to its arms. The angle can be changed only by changed the adjustment of threaded hangers 46, which moves arms 24 as well. Blade 8 of Scheunemann is bolted to plates 5, which in turn are rigidly attached to the frame. There are no arms pivotally mounting blades 8 to the frame, rather the entire frame moves up and down relative to wheels 14, as can be seen by comparing Figures 2 and 3. Wheels 14 are mounted to an axle 12 that had offset portions 13, as shown in Figure 1. No reference suggests this feature of claim 3.

Claim 4 requires serrations on oppositely facing first and second edges. As shown in Figure 3, serrations 45 can be employed or blade 30 inverted with serrations 49 employed to engage the earth. Scheunemann suggests serrations on one blade and a flat edge on another. Scheunemann does not suggest serrations on two edges of the same blade.

Claim 5 requires that the rake bar comprise a downward facing channel member. Referring to Figure 1 (as amended), it requires that the channel member 28 have a forward side 28a, a rearward side 28b, and an upper side 28c. It requires a blade 30 with serrations 45 or 49 mounted to the forward side. The free lower edges of the forward and rearward sides prevent the

serrations of the blade from digging too deeply. None of the references shows a channel member as claimed. Blade 54 of Wilson is mounted to a support bar, but the support bar does not have free lower edges on forward and rearward plates for engaging the ground.

Claim 6 requires that the broom bar be pivotally mounted to the broom bar arm to allow the broom bar to be positioned at various inclinations relative to the ground. Broom 86 of Gilberti does not appear to be pivotally mounted to its arm 90. The other references do not show brooms.

Claim 8 requires that the rake bar have forward and rearward parallel supporting plates, each having a free lower edge for engaging the ground. It requires a blade mounted to the forward plate with serrations below the lower edge of the forward supporting plate. Claim 8, similar to claim 1, requires that the broom bar having a storage position entirely forward of the wheels. As mentioned above, the references do not show these features.

Claim 8 also requires that the frame have a longitudinal beam that is centered on the apparatus. It requires that the rake bar arms be pivotally secured to this beam. Beams 1 and 2 (Fig. 3) of Potter are not centered, rather are located at the side edges. Beams 2 and 3 of Scheunemann are also located at the side edges. This important feature is not shown in the references.

Claims 9 and 10 claim features discussed above in connection with claims 3 and 6, respectively. Claims 11 and 12 claim features discussed above in connection with claims 4 and 2, respectively.

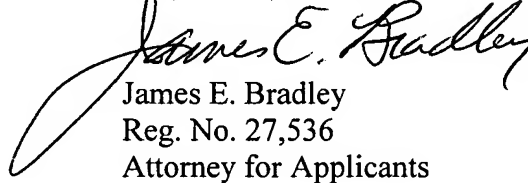
Claim 14 requires latch plates mounted to each of the rake arms, which are shown in Figure 2a by the numeral 55. It requires that the latch plates be spaced apart slightly greater than a width of the longitudinal beam for location on opposite sides of the beam. It requires a fastener

that inserts through holes 57 and rests on the longitudinal beam to support the rake bar in a storage position. This feature is not shown. In Potter, moving blade 22 to a storage position would require adjustment of threaded rod 46. Moving the frame up and down relative to the wheels in Scheunemann requires moving wheel 15.

Claim 18 requires that the rake bar comprise a downward facing channel member. This feature is not shown, as previously discussed. Claim 19 depends from claim 18 and claims a feature in a manner similar to claim 2, discussed above.

It is respectfully submitted that the claims are now in condition for allowance and favorable action is respectfully requested. If any fees are due, please charge them to Bracewell & Patterson, L.L.P. deposit account 50-0259.

Respectfully submitted,

  
James E. Bradley  
Reg. No. 27,536  
Attorney for Applicants

Bracewell & Patterson, L.L.P.  
P.O. Box 61389  
Houston, Texas 77208-1389  
Tel: 713/221-3301  
Fax: 713/222-3287

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